



April 25, 1991

Mr. Don Ostler, Executive Secretary
Utah Bureau of Water Pollution Control
288 North 1460 West
P.O. Box 16690
Salt Lake City, UT 84116-0690

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MINERALS PROGRAM
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APR 29 1991

DIVISION OF
OIL GAS & MINING

Re: Notice of Violations and
Order Docket No. I91-03

Dear Mr. Ostler:

This letter is in response to the four issues contained in your letter to Ken Kluksdahl dated April 18, 1991, which was in response to Tenneco Minerals' April 12, 1991 letter to the Bureau on item number 2 of the above referenced Notice of Violations and Order. For your convenience, each issue is listed below as well as Tenneco Minerals' response.

1. "The letter states that the diversion ditch will be modified by constructing storm water channels to direct runoff around the pad and pond areas. We need plans detailing the work to be performed on the diversion ditch showing grades and size of the proposed channels including calculations that demonstrates that the size of the channels will accommodate the 100 year storm event."

Tenneco Minerals understood that this information was a part of item 3 of the Order in the above referenced Notice of Violations and Order. On April 26, 1991, Tenneco Minerals will be submitting a detailed implementation plan and schedule in response to that item of the Order and in accordance with the deadline set for item 3 of the Order.

The existing storm water diversion channels that are not intended to remain following mine closure were permitted through the Utah Division of Oil, Gas and Mining and the Bureau and constructed to withstand the 10-year 24-hour storm event, which is 2.3 inches. Tenneco Minerals is formulating a plan which includes evaluating the Bureau's request to size these channels to withstand the 100 year storm event.

2. "We understand that breaching the existing diversion ditch and diverting water off the haul road onto the pad may have caused a solution release from the ponds. A plan must be developed and implemented to maintain the diversion ditch including policing operation of the facility to prevent breaches along the diversion ditch in the future."

Tenneco Minerals

Utah Bureau of Water Pollution Control
April 25, 1991
Page 2

Although we don't necessarily concur with your conclusion of the circumstances, in order to ensure that diversion structures are maintained, Tenneco Minerals plans to inspect diversion structures on a monthly basis. In addition, inspections will be conducted daily during storm events, and immediately following storm events. A log of the inspections will be kept on file. As a result of the inspections, Tenneco Minerals will conduct routine maintenance on the storm water diversion structures as necessary. Tenneco Minerals has also communicated the importance of maintaining the storm water diversion structures with its mining contractor.

3. **"Please explain in more detail the conversion of the sedimentation pond to a containment structure."**

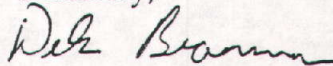
Tenneco Minerals understood that this information was a part of item 3 of the Order in the above referenced Notice of Violations and Order. On April 26, 1991, Tenneco Minerals will be submitting a detailed implementation plan and schedule in response to that item of the Order and in accordance with the deadline set for item 3 of the Order.

4. **"Define the extent and include a drawing showing investigation work that will be performed to conduct the groundwater study."**

Tenneco Minerals understood that this information is a part of item number 4 of the Order in the above referenced Notice of Violations and Order. This information will be submitted to the Bureau as soon as possible, but before May 31, 1991, as described in Tenneco Minerals' April 12, 1991, letter to the Bureau.

If you have any questions on the above, please call me at (303) 987-6256.

Sincerely,



Debra Brannum
Environmental Services Manager

cc: R. Johnson
K. Kluksdahl
M. Keller - Van Cott, Bagley
B. Bayer - JBR Consultants